

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLAN BARREDA, and all other Plaintiffs)
similarly situated known and unknown,)
Plaintiffs,) CIVIL ACTION
v.) Case No. 08-CV-3239
PROSPECT AIRPORT SERVICES, INC.,) Hon. Judge Kennelly
Defendant.) Magistrate Judge Nolan

**DEFENDANT'S MOTION FOR LEAVE TO FILE
MEMORANDUM IN EXCESS OF 15 PAGES INSTANTER**

Defendant, PROSPECT AIRPORT SERVICES, INC. ("Defendant"), by and through its attorneys, Arthur Holtzman and Lauren Blair of Pedersen & Houpt, moves this Honorable Court for leave to file Defendant's Memorandum of Law in Support of its Motion for Summary Judgment in excess of fifteen (15) pages, and in support thereof states the following:

1. Pursuant to Local Rule 7.1, briefs in support shall not exceed fifteen pages.
 2. A party may only submit a brief in excess of fifteen pages with leave of the Court.
 3. Plaintiff's Amended Complaint alleges three separate counts relating wages.

Additionally, Plaintiff is attempting to bring a collective wage and overtime action on behalf of himself and other employees of Defendant.

4. Defendant's counsel have worked diligently to prepare a succinct Memorandum of Law in Support of its Motion for Summary Judgment ("Memorandum"), but despite its best efforts, counsel for Defendant have been unable to reduce the length of the Memorandum to fifteen (15) pages and respectfully request leave to file its Memorandum of sixteen (16) pages

(including conclusion and signature block).

5. The undersigned counsel believes that it would not be possible to reduce the Memorandum appreciably without eliminating or weakening arguments, omitting or curtailing references to relevant facts, or impairing this Court's understanding of the law or facts.

6. Given that the Memorandum is just one page over the limit, Defendant requests that the Memorandum be relieved of the obligation of containing a table of contents.

7. This motion is being brought in good faith and no prejudice will result from a one-page extension.

WHEREFORE, Defendant, PROSPECT AIRPORT SERVICES, INC., Respectfully request that this Honorable Court grant the Motion for leave to file its Memorandum in excess of fifteen (15) pages *instanter*, and for any other just and equitable relief.

Respectfully submitted,
PROSPECT AIRPORT SERVICES, INC.

By: s/ Lauren Blair
One of Its Attorneys

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